



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Green River District, Price Field Office

125 South 600 West

Price, UT 84501

Phone: (435) 636-3600 Fax: (435) 636-3657

<http://www.blm.gov/ut/st/en/fo/price.html>



In Reply Refer To:

3482(UTG023)

SL-062583 (Lead Mine Lease #)

UTU-63214

UTU-73341 (LMU #)

OCT _ 6 2011

CERTIFIED MAIL—7010-3090-0002-7831-0481

RETURN RECEIPT REQUESTED

Mr. Kenneth E. May

General Manager

Canyon Fuel Company, LLC

SUFCO Mine

397 South 800 West

Salina, Utah 84654

RECEIVED

OCT 12 2011

DIV. OF OIL, GAS & MINING

Re: Monitoring and Mitigation Plan, South Fork of Quitchupah Creek Mining Area, SUFCO Mine

Dear Mr. May:

As part of the approval of a minor modification to the resource recovery and protection plan (R2P2) for the 2R2South Longwall panel (dated June 8, 2011), the Bureau of Land Management (BLM) determined that the modification of the plan would be in conformance with the lease stipulations. This determination included a monitoring and mitigation plan be submitted should stream flows be affected by underground mining. Both the Manti-LaSal and Fishlake National Forests have reviewed this plan (or a preliminary plan) and have submitted comments to the BLM, Utah State Office. A copy of these comments was sent directly to Leland Roberts of your staff. We are formally transmitting to you the Forest Services' comments (enclosed). It is also our understanding that a formal submission of a monitoring and mitigation plan for the South Fork area inside the SUFCO Mine permit area, has or will be sent to Utah Division of Oil Gas and Mining (UDOGM).

Please inform this office of the status of the subject plans and/or report to us the process Canyon Fuel intends to proceed with to have this monitoring and mitigation plan put in place. We intend

to work with UDOGM and the Forest Service in finalizing the plan and to oversee Federal coal lease stipulations. Any submissions, changes to and/or differences with the plan, please copy the BLM with the information. As administrator of the lease terms and stipulations, the BLM will consult with the other agencies with regards to these plans. If you have any questions, please contact Steven Rigby (435-636-3604) or Stephen Falk (435-636-3605) of my staff.

Sincerely,



Patricia A. Clabaugh
Field Manager

Enclosure:

FS Comments

cc: Utah State Office, (UTG923)

Fishlake National Forest
115 East 900 North
Richfield, UT 84701

Manti-LaSal National Forest
599 West Price River Drive
Price, UT 84501

Utah Division of Oil Gas and Mining
P. O. Box 145801
Salt Lake City, Utah 84114-5801

950



United States
Department of
Agriculture

Forest
Service

Fishlake National Forest
115 East 900 North
Richfield, UT 84701
(435) 896-9233

2011 JUL 11

AM 8:45

Manti-LaSal National Forest
599 West Price River Drive
Price, UT 84501
(435) 637-2817

File Code: 2820
Date: July 7, 2011

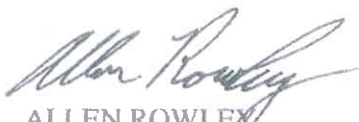
*Call
File*


Mr. Roger Bankert
Chief, Branch of Minerals
Utah State Office of the BLM
440 West 200 South
Salt Lake City, UT 84145

Dear Mr. Bankert:

Enclosed are our comments on Canyon Fuel Company's proposed monitoring and mitigation plan specific to the South Fork of Quitchupah Creek. As we agreed to on site with Sufco personnel on June 17th, we are sending a copy of this letter and the comments directly to Leland Roberts as well.

Sincerely,


ALLEN ROWLEY
Forest Supervisor
Fishlake National Forest


PAMELA E. BROWN
Forest Supervisor
Manti-LaSal National Forest

Enclosure

cc: Leland Roberts, Sufco Mine



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**Fishlake and Manti-LaSal National Forest comments on:
5-14-11 South Fork of Quitchupah Proposed Monitoring and Mitigation Plan**

Page 1:

Third paragraph, last sentence:

Suggested wording:

What is meant by "significantly diminished" stream flows?

Page 1:

Last paragraph, first sentence:

Suggested wording:

"Semi-weekly flow observations and visual inspections will continue for at least 12 weeks, or as conditions allow, after the completion of mining under the stream channel. The bi-weekly stream flow monitoring will continue for at least 4 weeks, or as conditions and monitoring results indicate necessary, after the completion of mining under the stream channel."

Page 2:

Top of the page

Suggested additional wording:

"Additional flow monitoring may be needed to determine specific locations where flow is being lost, and treatments are needed."

Page 2:

First full paragraph, second sentence:

Suggested wording:

"While mining is occurring under the stream channel, and within the 15-degree angle-of-draw above the active Longwall face, that area of the channel will be inspected semi-weekly for subsidence cracks or other related features."

Page 2:

Second full paragraph, second sentence:

Suggested wording:

"Sufco will attempt to seal cracks with the least intrusive methods (typically hand placement of grout or native materials) first."

Page 2:

Second full paragraph, third sentence:

Suggested wording:

"The sealing material may be placed, if cracks occur in an actively flowing portion of the stream, the stream may be temporarily diverted using native materials (or a designed flume if necessary to maintain the flow) until the crack is sealed."

Page 2:

Second full paragraph, last sentence:

What is meant by "arrangements will be made to get additional help to the site...?"

Page 3:

First full sentence on the page:

Who is the "consultant that has the appropriate experience in the sealing "?

Suggested changes:

"Provide a list of potential contractors; or

A contractor selected after consultation with the Forest Service; or

?"

Page 3:

After the first full paragraph on the page:

Suggested addition: (Some kind of worst-case scenario)

"If mitigation measures by SUFCO personnel, and their consultants and contractors, are not successful in restoring flows after two spring runoff periods, SUFCO will initiate additional analysis and planning with the Forest Service."

We also think it important that you commit to notify representatives of the Fishlake (Rob Hamilton) and the Manti-LaSal (Tom Lloyd or Darren Olsen) National Forests when you are mining in the area and when field monitoring is occurring.